AO91 (Rev. 8/01) Criminal Complaint

US MAGISTRATE COURT
GRG-SDTX
FILED
JUL 10 2014 3C
David J. Bradley, Clerk
Laredo Division

United States District Court

SOUTHERN DISTRICT OF **TEXAS**

UNITED STATES OF AMERICA
V.
Miguel GUERRERO
Laredo, Texas

(Name and Address of Defendant)

Next Atty
75K 45
PE 7/24/14

CRIMINAL COMPLAINT

Case Number: 5:14MJ0913

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about **July 8, 2014** (Date) in **Laredo, Texas** **Webb** County, in the **Southern** District of **Texas,** **Miguel GUERRERO** defendant(s) ,

a United States Citizen, did unlawfully transport Mexican nationals Jesus SAMANIEGO-Lopez, Guadalupe GALICIA-Cortez, and six other undocumented aliens by means of a motor vehicle within the Southern District of Texas knowing or in reckless disregard of the fact that said aliens had come to, entered, or remained in the United States in violation of law, and transported or moved said aliens within the United States by means of motor vehicle or otherwise, in furtherance of such violation of law.

in violation of Title **8** United States Code, Section(s) **1324 (a) (1) (A) (ii)**

I further state that I am a(n) **Special Agent, Homeland Security Investigations** (Official Title) and that this complaint is based on the following facts: based on statements of the accused and records of the Immigration & Naturalization Service.

See Attachment "A"

Continued on the attached sheet and made a part of this complaint: [X] Yes [ ] No

Signature of Complainant

Fernando Bonilla
Printed Name of Complainant

Sworn to before me and signed in my presence,

July 10, 2014 at Laredo, Texas
Date / City and State

Guillermo R. Garcia
U.S. Magistrate Judge
Name and Title of Judicial Officer

Signature of Judicial Officer

United States of America

vs

Miguel GUERRERO

[CONT OF BASIS OF COMPLAINT]

On July 8, 2013, Homeland Security Investigations (HSI), Laredo Special Agents (SAs) responded to the Laredo South Border Patrol station for an alien smuggling event involving eight undocumented aliens (UDAs).

At approximately 4:30 p.m., an off duty Webb County Sherrifs deputy made a concerned citizens call to the USBP dispatch center. The caller reported a group of people were running through the Santa Rita soccer fields and loading into a white Pontiac Grand Am that displayed temporary paper tags.

BPAs began to search the area looking for a vehicle matching the description given by USBP dispatch. While driving south on Ejido Ave searching for the white Pontiac, a BPA passed a vehicle matching the description of the vehicle reported by dispatch. BPAs began to follow the vehicle driving north on Ejido. BPAs contacted Laredo Police to assist them in the developing event.

An additional BPA was in his unit at the intersection of Ejido and La Pita Mangana when he spotted the vehicle matching the lookout description turn into a nearby neighborhood. BPAs proceeded to follow the vehicle into the neighborhood, but lost visual contact with the vehicle. As BPAs were exiting the neighborhood the reaquired the vehicle driving northbound on Ejido Ave.

BPAs stated an LPD unit arrived in the area just as the white Pontiac accelerated through the intersection of Ejido and La Pita Mangana with no regard for the stop signs in the intersection. The LPD unit began to follow the target vehicle, which then stopped abruptly near the intersection of Ejido and Exodus Ave. It was at that time that all occupants including the driver absconded from the vehicle on foot into the Cuatro Vientos subdivision.
Additional BPAs arrived on the scene and performed a search of the area. After a brief search, BPAs were able to apprehend 8 occupants and one driver.

BPAs performed interviews on all the individuals and it was determined that all eight occupants were undocumented aliens that crossed the United States border through the Rio Grande River. Miguel GUERRERO was identified as the driver of the white Pontiac Grand Am bearing Texas temporary tags (11G6429). GUERERO and the eight UDAs were transported to the Laredo South Station for further processing.

HSI Special Agents advised GURERRO of his Miranda rights, GUERRERO waived his rights to counsel at that time, and spoke to HSI SAs regarding his involvement in the attempted alien smuggling event. GURERRO admitted to HSI SAs that he knowingly transported undocumented aliens for monetary gain.

Jesus SAMANIEGO-Lopez, and Guadalupe GALICIA-Cortez identified GUERRERO as the driver of the vehicle that picked them up and was transporting them to an unknown location. Jesus SAMANIEGO-Lopez, and Guadalupe GALICIA-Cortez will be held as material witnesses in the case against GUERRERO